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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO TWENTY-SECOND  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (SECURITIES ADR NO  
LIABILITY CLAIMS) AND REQUEST FOR  
ORDER BY DEFAULT AS TO UNOPPOSED  
OBJECTIONS**

**[Re: Dkt. No. 13871]**

**Resolving Objections Set for Hearing  
August 23, 2023 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to  
5 Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern  
6 District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order*  
7 *Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No.  
8 1996], that the Court enter an order by default on the *Reorganized Debtors’ Twenty-Second Securities*  
9 *Claims Omnibus Objection (Securities ADR No Liability Claims)* [Docket No. 13871] (the “**Twenty-**  
10 **Second Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE**  
12 **TWENTY-SECOND SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Twenty-Second Securities Claims Omnibus Objection seeks to disallow and expunge certain  
14 proofs of claim filed by Securities Claimants who have failed to respond, after follow-up, to proper  
15 settlement offers made by the Reorganized Debtors. The claims subject to the Twenty-Second Securities  
16 Claims Omnibus Objection are listed in **Exhibit 1** thereto.

17 **NOTICE AND SERVICE**

18 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twenty-Second*  
19 *Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 13873] (the “**Notice of**  
20 **Hearing**”). The Twenty-Second Securities Claims Omnibus Objection was supported by the  
21 *Declaration of Robb McWilliams in Support of Reorganized Debtors’ Twenty-Second Securities Claims*  
22 *Omnibus Objection (Securities ADR No Liability Claims)* [Docket No. 13872] (the “**McWilliams**  
23 **Declaration**”). The Twenty-Second Securities Claims Omnibus Objection, the Notice of Hearing, and  
24 the McWilliams Declaration were served as described in the *Certificate of Service* of Alain B. Francoeur,  
25 filed on July 13, 2023 [Docket No. 13894] (the “**Certificate of Service**”). As further described in the  
26 Certificate of Service, on July 10, 2023, each holder of a claim listed on **Exhibit 1** to the Twenty-Second  
27 Securities Claims Omnibus Objection was served with a copy of the Twenty-Second Securities Claims  
28 Omnibus Objection, the Notice of Hearing, and the McWilliams Declaration.

The deadline to file responses or oppositions to the Twenty-Second Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following informal responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Donald D. Tufte	105532	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Alison Lu	102705	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Delgado Dental Inc FBO Juan Delgado	104475	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Diane S.I. Nishioka	101853	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Timothy K. Fenbert	104297	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Jerry Forsch, Forsch Family Trust	103369	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Oscar Alvarado	103790	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Patrick Dennis	6531	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Alfred J. Michalik	98774	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Barbara P. Dell	100708	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Deanne H. Woodruff	99805	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Gary Ward	104733	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Jeffrey R Copeland	102970	Claimant has responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Second Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Jessica Leah Irby	100037	Claimant has contacted the Reorganized Debtors' advisors in response to the Objection but has not yet responded to the Reorganized Debtors' offer to settle the claim, and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant time to respond to the offer.
Informal	Malcolm McLean	99424	Claimant has contacted the Reorganized Debtors' advisors in response to the Objection but has not yet responded to the Reorganized Debtors' offer to settle the claim, and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant time to respond to the offer.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a member of the law firm of Weil, Gotshal & Manges LLP ("**Weil**"), counsel for the Reorganized Debtors.

2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Twenty-Second Securities Claims Omnibus Objection except as described herein.

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1 WHEREFORE, the Reorganized Debtors hereby request entry of an order (1) disallowing and  
2 expunging the proofs of claim listed in the column headed "Claim(s) to be Disallowed and Expunged"  
3 in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Twenty-Second  
4 Securities Claims Omnibus Objection, except as otherwise discussed above.

5  
6 Dated August 18, 2023

7 **WEIL, GOTSHAL & MANGES LLP**

8 **KELLER BENVENUTTI KIM LLP**

9  
10 By: /s/ Richard W. Slack

11 Richard W. Slack

12 *Attorneys for Debtors and Reorganized Debtors*  
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